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SUPREME COURT
STATE OF WASHINGTON

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SUPREME COURT
OF THE STATE OF WASHINGTON

CLERK

LAURA HOLDEN,

Petitioner,

v.

FARMERS INSURANCE COMPANY
OF WASHINGTON, a domestic
insurer; FARMERS INSURANCE
EXCHANGE, a foreign insurer; and all
affiliated Farmers Insurance
Companies, and/or entities,

Respondents.

NO. 81487-2

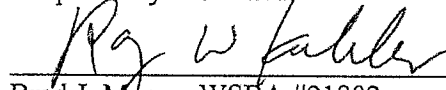
STATEMENT OF
ADDITIONAL
AUTHORITY

COMES NOW the Petitioner and submits the following additional
authority to the Court pursuant to RAP 10.8:

- *Mills v. Foremost Insurance Company*, 511 F.3d 1300 (11th Cir. 2008) (mobile home insurance policy that defined actual cash value as "the cost to repair or replace property with new materials of like kind and quality" less depreciation, not "less depreciation and profit, overhead, and taxes," did not unambiguously exclude overhead, profit, and taxes from actual cash value coverage and therefore required that insurer include state and local taxes).

DATED this 24th day of June, 2009.

Respectfully submitted,



Brad J. Moore, WSBA #21802

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DECLARATION OF SERVICE

BY RONALD R. CARPENTER

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On the date set forth below, I e-mailed the foregoing document to
the following parties:

Jeffrey A. Rosenfeld
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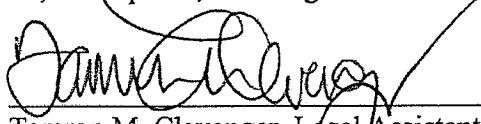
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Original sent by e-mail for filing with:
Washington Supreme Court
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supreme@courts.wa.gov

I declare under penalty of perjury under the laws of the State of
Washington and the United States that the foregoing is true and correct.

DATED: June 24, 2009, at Hoquiam, Washington.



Tamron M. Clevenger, Legal Assistant
Hoquiam, Washington
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